

**EXHIBIT 1****Defendants' Deposition Coordination Proposal—NY Class + News Cases**

1. All 30(b)(1) depositions noticed in the NY Cases (regardless of who noticed them) shall be coordinated, automatically cross-noticed, and may be used across all of the NY Cases in accordance with Rule 32. Deposition hours shall be counted against all taking parties who participate in accordance with their time spent on the record examining the witness.

2. If a 30(b)(1) deposition of an OpenAI-affiliated witness is noticed in the California Consolidated Class Action, OpenAI will promptly inform the New York Plaintiffs of such notice, and OpenAI and the New York Plaintiffs will use reasonable efforts to schedule the deposition on a date on which the New York Plaintiffs are available to participate. In such cases, the New York Plaintiffs will use their time after the California Plaintiffs have exhausted their time. The deposition hours shall be counted against all taking parties in accordance with their time on the record. OpenAI will use reasonable efforts to confirm availability of NY Plaintiffs before confirming a deposition date in the California Consolidated Class Action. To the extent a party questions its own witness, such time will not count against the limits set forth below.

3. In order to effectuate coordination of 30(b)(6) witness testimony, all NY Class Plaintiffs and News Plaintiffs shall each serve consolidated and comprehensive 30(b)(6) Notices on Defendants by February 14, 2025. Defendants shall designate 30(b)(6) witnesses for single sittings across all NY cases, and to the extent such witnesses are also 30(b)(1) witnesses, they will testify in all capacities at the same time.

4. Microsoft is not a party in the California Consolidated Class Action but Plaintiffs may seek to take non-party depositions of Microsoft in those cases. If so, the same procedures as in paragraphs 2 and 3 shall apply to such witnesses.

5. Time limits:

	<b>NY Class Cases</b>	<b>News Cases</b>
<b>Depositions Taken by Plaintiffs</b>	140 hours, no more than 70 hours of one Defendant	140 hours, no more than 70 hours of one Defendant
<b>Depositions Taken by Defendants</b>	120 hours of Class Plaintiffs	210 hours, no more than 70 hours of Times, 70 hours of Daily News Plaintiffs, 70 hours of CIR

Additional time limits:

- a. 5 hours (all NY cases) for Apex witnesses<sup>1</sup>
- b. 9 hours for individuals noticed in NY Class & News cases as 30(b)(1) only
- c. 12 hours for individuals noticed in NY Class & News cases as both 30(b)(1) and 30(b)(6)
- d. Non-party witnesses affiliated with a party (e.g., former employee) count against the limits applicable to that party.

<sup>1</sup> Defendants previously suggested a 7-hour limit for Apex depositions, but that proposal was made as part of comprehensive proposal for coordination across the New York and California cases. A 5-hour limit for Apex depositions in the New York cases only is reasonable.